

**BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA**

**DOCKET NO. 2020-63-E**

IN RE: Bridgestone Americas Tire	)	
Operations, LLC,	)	
	)	
Petitioner,	)	<b>REBUTTAL TESTIMONY</b>
v.	)	<b>OF COURTNEY CANNON</b>
	)	
Dominion Energy South Carolina,	)	
Inc.	)	
	)	
Respondent.	)	
	)	

1    **Q.    PLEASE STATE YOUR NAME, PRESENT POSITION, AND BUSINESS**  
2    **ADDRESS.**

3    **A.    Courtney Cannon, Senior Manager, Project Management Office, Bridgestone Americas**  
4    **Tire Operations, LLC (“BATO”), Process Systems Development, 200 4<sup>th</sup> Ave South, Nashville,**  
5    **TN 37201.**

7    **Q.    MS. CANNON, DID YOU SUBMIT DIRECT TESTIMONY IN THIS DOCKET?**

8    **A.    Yes, I testified to BATO’S renewable energy policy.**

10   **Q.    ARE YOU AWARE THAT MR. RAFTERY TESTIFIES THAT BATO IS A**  
11   **VALUED CUSTOMER AND THAT DOMINION ENERGY SOUTH CAROLINA, INC.**  
12   **AND BATO HAVE MAINTAINED A GOOD RELATIONSHIP FOR MANY YEARS?**

13   **A.    Yes.**

1    **Q.     DOES BATO ACCEPT MR. RAFTERY'S ASSERTION?**

2    **A.**    No. Although Mr. Raftery notes the benefits that BATO provides its employees, its  
3 communities and, frankly, DESC in the way of significant revenue, DESC has consistently failed  
4 to treat BATO as a "valued customer".

5  
6 Since BATO entered South Carolina, it has invested billions of dollars in the Aiken plants and  
7 equipment. BATO has expanded its Aiken county footprint three times, each time adding to the  
8 employment rolls. BATO employs over 2300 women and men in Aiken County and provides  
9 them state of the art working conditions and is committed to their families and  
10 community. Consequently, BATO invests heavily in its employees and our Aiken community.

11  
12 To manufacture tires, BATO consumes substantial amounts of electricity from DESC and each  
13 time BATO expanded its plant and facilities, it has increased its electric load and the revenues it  
14 pays to DESC. On two occasions, DESC submitted BATO's contract for electric service to the  
15 Public Service Commission for approval and approval was granted. Each time BATO has  
16 invested in its plant and facilities, it has honored its contract with DESC

17  
18 For over three years, BATO has attempted to work in good faith with DESC regarding the  
19 construction and operation of the solar array. For over three years, BATO has been stymied by  
20 DESC's various attempts to undermine and delay placing the solar array in service. BATO first  
21 approached DESC about renewable energy in 2017. DESC recommended a fast track  
22 interconnection process, but subsequently reversed course, claiming that BATO's application was  
23 untimely. It was not. BATO approached DESC second time, this time about building a solar array

1 behind the meter and provided DESC all the information concerning the solar array required by  
2 the parties' contract. Having been fully informed of the technical nature of the solar array, DESC  
3 insisted that BATO install additional equipment in its plant facility to protect DESC from damage  
4 to its facilities and equipment. BATO complied with this additional request. DESC then gave  
5 BATO the green light to construct the current solar array, according to the parties' contract. DESC,  
6 for the second time, reversed course, requiring BATO to enter the interconnection queue. Even  
7 though BATO has fully informed DESC of the properties of the solar array, DESC has continually  
8 refused to provide BATO any expectation as to when the solar array can be put in service, thus  
9 depriving BATO of the benefit of the use of the solar array. Since, the solar array will strictly be  
10 for self-consumption by BATO and will fully protect DESC's equipment and facilities, it is our  
11 position that the South Carolina Generator Interconnection Procedures do not apply to BATO's  
12 solar array and that DESC should honor its contract. Therefore, as is its right, BATO has asked the  
13 Public Service Commission to protect BATO's right to operate its solar array.

14  
15 BATO has met every requirement imposed by DESC and has otherwise taken every precaution to  
16 protect DESC's facilities and equipment. However, rather than fulfill its obligations under the  
17 contract with BATO, DESC is hiding behind an unnecessarily complicated, labyrinthine generator  
18 interconnection process to arbitrarily deprive not only BATO but all DESC's customers from the  
19 opportunity to install and operate solar generation behind the meter. Mr. Furtick admits as much  
20 when he testified on page 8, ll. 7-10: "[t]o be clear, if the Generating Facility's operation is not  
21 deemed as 'parallel,' then it is unclear how many – if any – generators in South Carolina would be  
22 subject to the South Carolina Standard given that they contain similar, if not identical, operation  
23 characteristics." It appears that DESC's true concern is that further commitment to renewable

1 energy resources—that will benefit all South Carolinians—will eat into its profits. BATO urges  
2 the South Carolina Public Service Commission to construe BATO’s contract with DESC to  
3 authorize the operation of a solar array behind-the-meter, paving the way for DESC customers to  
4 take advantage of the opportunity to do so too. If South Carolina’s policy is to advance the use of  
5 renewable energy, DESC has acted to obstruct it.

6  
7 **Q. HOW WOULD YOU RESPONDE TO MR. HODGES’ TESTIMONY OFFERING**  
8 **TO SELL BATO RECS TO PERMIT BATO TO MEET ITS RENEWABLE GOALS.**

9 A. BATO is aware of the options available to it with respect to Renewable Energy Certificates  
10 (“REC”).

11 As mentioned in my direct testimony on pages 5-6, BATO’s commitment to renewable energy is  
12 part of our Corporate Social Responsibility policy, *Our Way to Serve*. Our aggressive  
13 commitments to sustainability are not reliant on a single outlet like the purchase of RECs. While  
14 purchasing RECs is an important element that demonstrates a support of the development of  
15 renewable energy elsewhere to offset Scope 2 emissions, our program aims to influence the culture  
16 and awareness of Bridgestone teammates and our communities on our sustainability journey. The  
17 solar array in Aiken lines the driveway of the main plant entrance and can have a profound impact  
18 on our culture. Every teammate and visitor driving into the plant sees this array and knows in that  
19 moment that Bridgestone is committed to a sustainable future. Our commitment to sustainability  
20 is more than a dollar investment that can be achieved through the purchase of RECs. To suggest  
21 otherwise disregards what is at the heart of *Our Way to Serve* and our Environmental Mission  
22 Statement to be “continually working toward a sustainable society with integrity and in unity with  
23 our customers, partners, communities and the world around us.”

1 BATO should not be forced to purchase RECs if it has an alternative. Authorizing BATO to  
2 operate its solar array will have a more direct positive impact on the South Carolina community.  
3 If DESC truly valued BATO as a customer, DESC would allow BATO to operate its \$2.7 million  
4 solar array and to benefit from the resulting savings in energy costs.

5

6 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

7 **A.** Yes, it does. I would like to thank the Commission for hearing our case.